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REMARKS

This response is intended as a full and complete response to the Office Action dated October 13, 2005. In view of the amendments and following discussion, the Applicant believes that all claims are in allowable form.

CLAIM AMENDMENTS

With respect to claim 1, the term "member" has been amended to the term "element" as suggested by the Examiner to clarify antecedent basis. Although the Applicant believes these the terms "element" and "member" are interchangeable, claims 22-28 have been amended to replace the term "member" with "element" to maintain consistency of claim language.

Claims 10 and 11 have been amended to depend from claim 9 as suggested by the Examiner to provide a proper antecedent.

CLAIM REJECTIONS

A. 35 U.S.C. §102(e) Claims 1-9, 12-14, 16-19 and 21

Claims 1-9, 12-14, 16-19 and 21 stand rejected as being anticipated by United States Patent No. 6,568,540, issued May 27, 2003, to *Holzmann et al.*, (hereinafter referred to as "*Holzmann*"). In response, the Applicant has amended claims 1 and 21 to more clearly recite aspects of the invention.

Independent claims 1 and 21, as amended, recite limitations not taught or suggested by *Holzmann*. *Holzmann* teaches a filter assembly having a unitary frame and a gasket member to support a filter media element. The gasket member is molded to the media pack 16 by gas-assist injection. In the embodiment of Figure 9 cited by the Examiner, the gasket molded to seal the edge of layered sheets of media 16a. Therefore, the filter assembly taught in *Holzmann* includes a single gasket molded to a media pack, wherein the gasket is compressively sealed to a frame of the filter assembly. (Col. 2, 16-19, Col. 4 16-20, and Figure 9). In contrast, *Holzmann* does not teach or suggest a filter assembly having a pleated filter media pack, and a first compressible seal element and a second seal element both engaged with a frame assembly,

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wherein the second seal element bias the media pack against the first seal element, as recited by claim 1. Additionally, *Holzmann* does not teach or suggest a first pair of seal elements disposed in a frame assembly and clamping a first open end of a media pack, and a second pair of seal elements disposed in the frame assembly and clamping a second open end of the media pack, as recited by claim 21.

It is also noted that *Holzmann* does not teach or suggest a media pack that is compressively sealed or a second compressive seal as recited by dependent claims 2 and 5.

Thus, the Applicant submits that independent claims 1 and 21, and all claims respectively depending therefrom, are patentable over *Holzmann*. Accordingly, the Applicant respectfully requests the rejection be withdrawn and the claims allowed.

B. Claims 22-24

Claims 22-24 stand rejected as being anticipated by *Holzmann*. In response, the Applicant has amended claim 22 to more clearly recite aspects of the invention.

Independent claim 22, as amended, recites limitations not taught or suggested by *Holzmann*. As discussed above, *Holzmann* teaches using a single gasket molded to a media pack, wherein the single gasket is compressed by the frame. However, *Holzmann* does not teach or suggest compressing an edge of a pleated filter media pack between a first and second seal element, as recited by claim 22. Therefore, *Holzmann* does not teach or suggest placing a pleated media pack having an open edge in at least a first portion of a housing assembly, and compressing the open edge of the pleated filter media pack between a first and second seal element.

Thus, the Applicant submits that independent claim 22, and all claims respectively depending therefrom, are patentable over *Holzmann*. Accordingly, the Applicant respectfully requests the rejection be withdrawn and the claims allowed.

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C. Claim 28

Claim 28 stands rejected as being anticipated by *Holzmann*. In response, the Applicant has amended independent claim 28 to more clearly recite aspects of the invention.

Independent claim 28, as amended, recite limitations not taught or suggested by *Holzmann*. *Holzmann* has been discussed above. *Holzmann* does not teach or suggest inserting a pleated filter media pack into a filter frame, inserting a first seal member into the filter frame proximate a first open edge of the filter media pack, clamping the first open edge of the filter media pack between the first seal member and a second compressible seal member, as recited by claim 28.

Thus, the Applicant submits that independent claim 28 is patentable over *Holzmann*. Accordingly, the Applicant respectfully requests the rejection be withdrawn and claim 28 allowed.

F. 35 U.S.C. §103(a) Claim 20

Claim 20 stands rejected as being unpatentable over *Holzmann* in view of United States Patent No. 6,074,450 issued Jun 13, 2000 to *Raber, et al* (hereinafter referred to as "*Raber*"). In response, the Applicant has amended claim 1, from which claim 20 depends, to more clearly recite aspects of the invention.

Independent claim 1, as amended, recites limitations not taught or suggested by the combination of *Holzmann* and *Raber*. As discussed above, *Holzmann* does not teach or suggest the limitations recited by claim 1. *Raber* teaches a container in a filter assembly having grille elements joint together by a frame to better secure the overall structure. (Col. 3, Line 7-10). However, *Raber* does not teach or suggest any modification to the filter assembly of *Holzmann* in a manner that would yield a filter assembly having a pleated filter media pack, and a first compressible seal element and a second seal element both engaged with a frame assembly, wherein the second seal element bias the media pack

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against the first seal element, as recited by claim 1. Therefore, a *prima facie* case of obviousness has not been established because the combination of *Holzmann* and *Raber* fails to teach or suggest the limitation recited in claim 1.

Thus, the Applicant submits that claim 20, which depends from claim 1, is patentable over *Holzmann* in view of *Raber*. Accordingly, the Applicant respectfully requests the rejection be withdrawn and claim 20 allowed.

ALLOWABLE SUBJECT MATTER

The Applicant thanks the Examiner for his comments regarding the allowability of claims 10-11, 15 and 25-27 if re-written in independent form. However, in view of the amendment and arguments set forth above, the Applicant believes base claims 1 and 22 (and all intervening claims) are in allowable form, and as such, claims 10-11 and 25-27 are also in condition for allowance as they now stand.

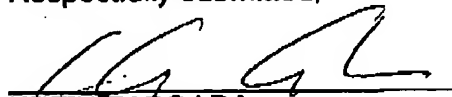
CONCLUSION

Thus, the Applicant submits that all claims now pending are in condition for allowance. Accordingly, both reconsideration of this application and its swift passage to issuance are earnestly solicited.

If, however, the Examiner believes that any unresolved issues still exist, it is requested that the Examiner telephone Mr. Keith Taboada at (732) 530-9404 so that appropriate arrangements can be made for resolving such issues as expeditiously as possible.

Respectfully submitted,

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